

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

SHAWNDA TIERNAN

Civil Case Number: 3:16-cv-2602

Plaintiffs,
-against-

G&R COLLECTIONS and MBG, INC.

CIVIL ACTION

**PLAINTIFF'S MOTION TO ENFORCE
SETTLEMENT AGREEMENT AGAINST
DEFENDANT STELLAR RECOVERY,
INC. and FOR ATTORNEY'S FEES.**

Defendants.

PLEASE TAKE NOTICE that upon this Notice of Motion Plaintiff Shawnda Tiernan (“Plaintiff”), by and through her undersigned counsel, moves this Honorable Court, on a date and time to be determined by the Court, for an Order to Enforce the settlement of \$30,000.00 and for a judgment against the Defendant in the amount of \$30,000.00, plus attorney’s fees for filing this Motion. The parties reached a settlement, not subject to any limitations, on August 25, 2017, however, Defendant has yet to finalize the settlement agreement. Plaintiff relies on a Memorandum of Law in Support, a Declaration of Shawnda Tiernan and on a Declaration of Ari H. Marcus.

Dated: October 12, 2017

/s/ Ari Marcus

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CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of October, 2017, the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's ECF system. Parties may access this filing through the court's system.

/s/ Ari H. Marcus

Counsel for Plaintiff Shawnda Tiernan